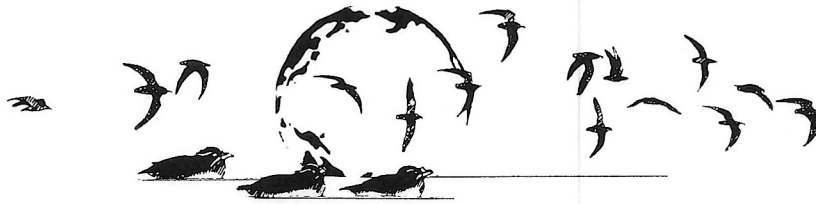

Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

September 9, 1991

E.C. Fullerton, Director
National Marine Fisheries Service
300 South Ferry Street
Terminal Island, California 90731

Re: Proposed Rule for Fishery Management Plan in Hawaii

Dear Sir:

The Pacific Seabird Group (PSG) is an international organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. Its members are drawn from the entire Pacific basin, including Canada, Mexico, Japan, the U.S.S.R., China, Australia and New Zealand. Among its members are biologists who have research interests in Pacific seabirds, state and federal officials who manage seabird refuges, and many individuals who are interested in marine conservation.

These comments respond to the proposed rule in 56 Federal Register 37070 (1991). PSG supports the National Marine Fisheries Service's proposed rule to prohibit longline fishing within 50 nautical miles of certain Northwestern Hawaiian Islands as well as within corridors between those islands. PSG also supports an observer program to ensure that fishermen obey the laws and regulations. We understand that the longline fleet in Hawaii has more than tripled since 1987 and that this rule is necessary to control a fishery that has been expanding rapidly in these remote waters. Although the proposed rule seems prompted primarily by concerns about injuries to monk seals, there have been many reports that longline fishermen have hooked and injured albatrosses and other seabirds.

PSG notes that the proposed rule will have at least three other important benefits for the 14 million seabirds of 18 species that inhabit the Northwestern Hawaiian Islands (Fefer et al. 1984:27) apart from direct injuries by fishing equipment. First, the introduction of rats, cats or other alien creatures to these fragile islands, by accident or design, could wreak havoc on the biological resources that live there (Harrison 1990:194-95). For example, the HINWR refuge manager found rat poison on the wreck of a Japanese fishing vessel that broke up on the reef at Laysan in 1969. Other boating accidents over the years have been far too common. Second, fishing vessels operating in nearshore waters are often the source of oil pollution. Third, many species of seabirds rely on tunas and other predatory fishes to drive prey to the surface. Accordingly, the waters next to the breeding islands must be carefully managed to ensure that they are not over-fished. For these reasons, we firmly believe that all fishing vessels should be kept well away from the Northwestern Hawaiian Islands.

PSG solidly supports the rule proposed by the National Marine Fisheries Service and appreciates this opportunity to lend its expertise on these important issues.

Sincerely,

Arthur Sowls, *cm*

Arthur Sowls
Conservation Committee Chairman
202 West Pioneer Avenue
Homer, Alaska 99603

References

Fefer, S.I. et al. 1984. Synopsis of Results of Recent Seabird Research Conducted in the Northwestern Hawaiian Islands. In: Griggs and Tanoue, eds., Resources Investigations in the Northwestern Hawaiian Islands, Volume 1, University of Hawaii Sea Grant College Program.

Harrison, C.S. 1990. Seabirds of Hawaii: Natural History and Conservation. Cornell University Press.